

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**IN RE: TAXOTERE (DOCETAXEL)
PRODUCTS LIABILITY LITIGATION**

**: MDL NO. 2740
:
: SECTION "N"(5)
: JUDGE ENGELHARDT
: MAG. JUDGE NORTH**

ALISA LARSEN

Plaintiff,

: COMPLANT & JURY DEMAND

vs.

SANOFI-AVENTIS U.S. LLC, separately, and doing business as WINTHROP U.S.; and
SANOFI U.S. SERVICES, INC. f/k/a SANOFI-AVENTIS U.S., INC.

: Civil Action No.: 17-14876

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Defendant(s).

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AMENDED SHORT FORM COMPLAINT

Plaintiff incorporates by reference the Master Long Form Complaint and Jury Demand filed in the above-referenced case on March 31, 2017. Pursuant to Pretrial Order No. 15, this Short Form Complaint adopts allegations and encompasses claims as set forth in the Amended Master Long Form Complaint against Defendants.

Plaintiff further alleges as follows:

1. Plaintiff:

ALISA LARSEN

2. Spousal Plaintiff or other party making loss of independent/secondary claim (i.e., loss of consortium):

3. Other type of Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):

4. Current State of Residence: Oregon _____

5. State in which Plaintiff(s) allege(s) injury: Oregon _____

6. Defendants (check all Defendants against whom a Complaint is made):

a. Taxotere Brand Name Defendants

- ☐ A. Sanofi S.A.
- ☐ B. Aventis Pharma S.A.
- ☒ C. Sanofi US Services Inc. f/k/a Sanofi-Aventis U.S. Inc.
- ☒ D. Sanofi-Aventis U.S. LLC

b. Other Brand Name Drug Sponsors, Manufacturers, Distributors

- ☐ A. Sandoz, Inc.
- ☐ B. Accord Healthcare, Inc.
- ☐ C. McKesson Corporation d/b/a McKesson Packaging
- ☐ D. Hospira Worldwide, LLC f/k/a Hospira Worldwide Inc.
- ☐ E. Hospira Inc
- ☐ F. Sun Pharma Global FZE
- ☐ G. Sun Pharmaceutical Industries, Inc. f/k/a Caraco Pharmaceutical Laboratories Ltd.
- ☐ H. Pfizer, Inc.
- ☐ I. Actavis, LLC f/k/a Actavis, Inc.
- ☐ J. Actavis Pharma, Inc
- ☐ K. Other:

7. Basis for Jurisdiction:

☒ Diversity of Citizenship

☐ Other (any additional basis for jurisdiction must be pled in sufficient detail as required by the applicable Federal Rules of Civil Procedure):

8. Venue:

District Court and Division in which remand and trial is proper and where you might have otherwise filed this Short Form Complaint absent the direct filing Order entered by this Court:

District Court of Oregon

9. Brand Product(s) used by Plaintiff (check applicable):

☒ A. Taxotere

☐ B. Docefrez

☐ C. Docetaxel Injection

☐ D. Docetaxel Injection Concentrate

☐ E. Unknown

☐ F. Other:

10. First date and last date of use (or approximate date range, if specific dates are unknown) for Products identified in question 9:

November 2007 and January 2008

11. State in which Product(s) identified in question 9 was/were administered:

Oregon

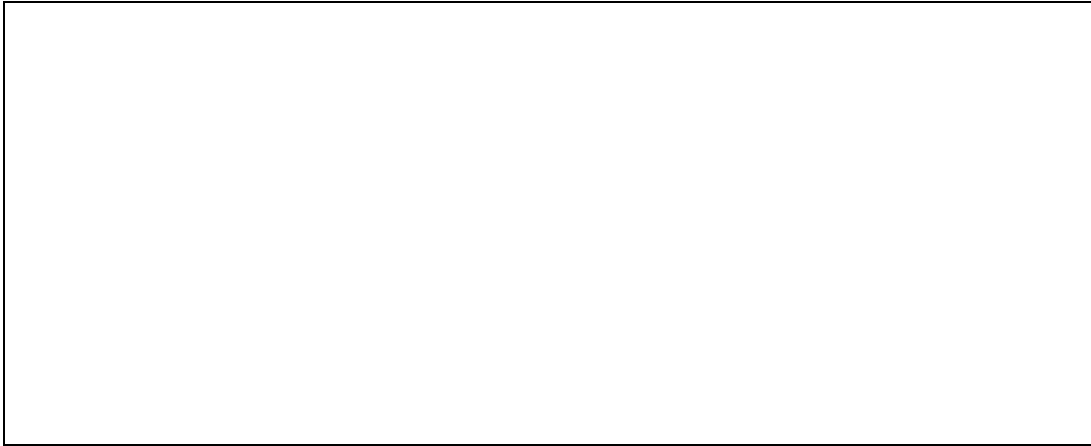
12. Nature and extent of alleged injury (including duration, approximate date of onset (if known), and description of alleged injury):

Severe and personal injuries that are permanent and lasting in nature including and economic and non-economic damages harms and losses, including, but not limited to: past and future medical expenses; psychological counseling and therapy expenses; past and future loss of earnings; past and future loss and impairment of earning capacity, permanent disfigurement, including permanent alopecia; mental anguish; severe and debilitating emotional distress; increased risk of future harm; past, present and future physical and mental pain, suffering and discomfort; and past, present and future loss and impairment of the quality and enjoyment of life

13. Counts in Master Complaint brought by Plaintiff(s):

- ☒ Count I – Strict Products Liability - Failure to Warn
- ☐ Count II – Strict Products Liability for Misrepresentation
- ☒ Count III – Negligence
- ☒ Count IV – Negligent Misrepresentation
- ☒ Count V – Fraudulent Misrepresentation
- ☒ Count VI – Fraudulent Concealment
- ☒ Count VII – Fraud and Deceit
- ☐ Count VIII – Breach of Express Warranty (Sanofi Defendants only)

- ☐ Other: Plaintiff(s) may assert the additional theories and/or State Causes of Action against Defendant(s) identified by selecting “Other” and setting forth such claims below. If Plaintiff(s) includes additional theories of recovery, for example, Redhibition under Louisiana law or state consumer protection claims, the specific facts and allegations supporting additional theories must be pleaded by Plaintiff in sufficient detail as required by the applicable Federal Rules of Civil Procedure.



14. Name of Attorney(s), Bar Number(s), Law Firm(s), Phone Number(s), Email Address(es) and Mailing Address(es) representing Plaintiff(s):

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